

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

LEAGUE OF UNITED LATIN	§	
AMERICAN CITIZENS, et al.	§	
	§	
v.	§	CIVIL ACTION NO. 2:03-CV-354
	§	
RICK PERRY, et al.	§	Consolidated
	§	

**SWORN DECLARATION OF GONZALO BARRIENTOS**

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is Gonzalo Barrientos. I reside in Travis County, Texas. I am an elected official in Travis County; I hold the position of State Senator, District 14. I was first elected to the Texas State Senate in 1985. Prior to that time, I served in the Texas House from 1975 to 1985.
2. As an elected official and a community leader who represents the significant interests of Travis County, I am writing this Declaration to detail serious concerns and objections that I have to the congressional redistricting plan proposed by Perry and other State Defendants numbered Plan 1418C, as they relate to the county.
3. Prior to the 2003 redistricting plan that was declared unconstitutional due to a South Texas configuration that attempted to replace a non-performing District 23 with a narrow 300 mile predominantly Hispanic District 25 that reached into Travis County, our County and the City of Austin was represented by two Congressional districts, including one (District 10) that encompassed the core of Austin. This configuration enhanced the ability of a Austin's unique tri-ethnic coalition to affect our representation in Congress consistent with that same coalition's impact on local elections.
4. In 2003, Plan 1374C literally gutted the City of Austin and Travis County, splitting the community almost equally into three congressional districts and leaving us as the largest Texas County without a single truly local congressional district. Instead of curing the defects of the current plan, Plan 1418C is actually worse than the current plan and exacerbates its worst elements, including the placement of the heart of Austin -- downtown, the State Capitol and UT -- in a different San Antonio-based district (23), which would place these institutions in a different district for three straight election cycles.
5. Under plan 1418C, every resident of Travis County who does not reside in District 10, which is not changed by Plan 1418C, would be placed in a new congressional district with a new Member of Congress -- for the third election in a

EXHIBIT

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- row in many cases. The State Defendants' plan would move over half a million (531,279) residents (65%) of Travis County into new districts. In the City of Austin alone, 435,552 residents (66%) would find themselves in new districts.
6. A closer look at these population shifts shows an even more blatant disregard for our sense of community. As bad as the current plan is for Austin and Travis County, core African-American and Hispanic communities and East, Southeast, and South Austin were united in the current District 25, where they have an opportunity to elect the candidate of their choice. Under this plan, almost 100,000 of that core population is moved into District 23 from Northeast Austin and South Austin. The remaining core minority population – 137,757 residents, including 31,305 African Americans and 73,443 Hispanics – are switched into an Anglo-dominated San Antonio based District 21, where they will have no impact on their congressional election as a result of this fracturing of the minority community.
  7. In South Austin, Plan 1418C splits the entire South Austin Hispanic community west of I-35 apart from the East and Southeast Austin Hispanic community and places it in Anglo-dominated District 23. As a result, the Hispanic community in this area will be prevented from having an effective voice in either District 21 or District 23. This area of South Austin includes many neighborhoods along South First St., Manchaca Rd., and Brodie Lane that are experiencing rapid Hispanic population growth as the Austin Hispanic community extends southward.
  8. Currently, the African-American population in Travis County is primarily divided between District 25 and District 10. However, Plan 1418 extends an arm of CD23 east of I-35 into the integrated and politically active University Hills and Windsor Park communities, creating a wedge between the proposed Districts 10 and 21 to split the African-American community into three Anglo-dominated districts where they will have virtually no voice.
  9. In total, under Plan 1418C, San Antonio-based District 23 would pick up over 370,000 Travis County residents and 297,795 City of Austin residents for the first time. The majority of these residents would be placed in a different district for three straight election cycles if this plan were to be enacted.
  10. The facts here are clear: the Perry and other State Defendant's Plan 1418C amounts to a public declaration of contempt for Travis County and the City of Austin in an egregious exercise of gerrymandering designed to weaken the voice of the Travis County majority – a result that has nothing to do with providing for a remedy for an unconstitutional South Texas congressional district.

I declare under penalty of perjury that the foregoing is true and correct.

This 20th day of July, 2006.

